



STATE OF TENNESSEE  
**DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT**  
DIVISION OF WORKFORCE SERVICES  
220 French Landing Drive  
Nashville, TN 37243-1002  
(615) 741-1031

**Workforce Services Policy – Co-Enrollment of American Job Center Customers**

**Effective Date:** May 12, 2017

**Duration:** Indefinite

**Subject:**

The purpose of the Workforce Innovation and Opportunity Act (WIOA) is to develop Tennessee's workforce by encouraging access to education and skills training as they directly align with business needs. This policy introduces strategies to strengthen participant outcomes by increasing access to multiple services in order to benefit the long-term success of program participants. This simultaneous admission to programs is known as 'co-enrollment'.

**Purpose:**

This policy outlines the process for participant co-enrollment, according to eligibility, as a method to provide effective service by combining WIOA core programs offered at American Job Centers (AJCs). These program areas—mandated by WIOA—include:

- Adult, Dislocated Worker, and Youth Activities (Title I)
- Adult Education and Literacy Activities (Title II)
- Wagner-Peyser (Title III)
- Vocational Rehabilitation Services (Title IV)

Co-enrollment ensures that an individual receives skills training, or other education, to carry out their individualized development plan while providing needed support to reduce the probability of participant drop-out due to barriers (such as lack of transportation). Participants who are co-enrolled in multiple programs have resources leveraged in a way that increases the probability to achieve long-term success in the labor market.

**Scope:**

Office of the Governor, Tennessee Department of Labor and Workforce Development (TDLWD); Division of Workforce Services (WFS); Tennessee Department of Economic and Community Development (ECD); Tennessee Department of Education (TNED); Tennessee Department of Human

Services (DHS); State Workforce Development Board (SWDB); Title I – Adult, Dislocated Worker, and Youth Programs, Title II – Adult Education and Family Literacy Act Program(AE); Title III – Wagner-Peyser Act Program (WP); Title IV – Vocational Rehabilitation Program (VR); Regional Planning Council (RPC); Local Workforce Development Boards (LWDB); Local Workforce Development Areas (LWDA); American Job Center (AJC); One-Stop Operator (OSO); Workforce System Sub-Recipients (Sub-Recipients); Workforce System Partners (Partners)

**Background:**

WIOA emphasizes the alignment of core programs, known as partner programs, within the One-Stop Service Delivery system. Access to resources, such as training and support services, may be made available through a Memorandum of Understanding (MOU) between the core program partners. Partner agencies must facilitate the development of career pathways and co-enrollment, as appropriate, in core programs<sup>1</sup>.

**I. Definitions:**

**A. Core Program:**

A program authorized under a core program provision WIOA Section 3(12)

**B. Core Program Provision:**

- WIOA Chapters 2 and 3 of Subtitle B of title 1 (relating to youth workforce investment activities and adult and dislocated worker employment and training activities)
- WIOA Title II (relating to adult education and literacy activities)
- Wagner-Peyser Act Sections 1 through 13 (relating to employment services)
- Rehabilitation Act of 1973 Title 1 (relating to vocational rehabilitation services) WIOA Section 3(13)(A)-(D)

**C. Workforce Development System:**

A system that makes available the core programs, the other One-Stop partner programs, and any other programs providing employment and training services as identified by a State Workforce Development Board (SWDB) or Local Workforce Development Board (LWDB) WIOA Section 3(67).

**II. How to Identify Eligible Participants:**

Individuals entering an AJC will be greeted with a “no wrong door” approach; the Tennessee Combined State Plan indicates that there is no incorrect entry point for an individual seeking services. During the first step a staff member will conduct a verbal assessment—mainly focused on the individual’s eligibility for WIOA Title I and III programs—that addresses barriers to employment, establishes priority of service, and identifies a disability that requires further resources. Using this assessment the staff member then offers guidance about the most appropriate next steps.

During initial assessments staff is required to ascertain the individual’s long-term employment goal; furthermore, staff must work with the individual to formulate a plan to achieve this goal. The strategy for co-enrollment will focus on short-term training to enter or re-enter employment while maintaining sight of how this plan will lead to long-term self-sustainability within the labor market.

---

<sup>1</sup> 20 CFR 679.560(b)(2)(ii)

### **III. Enrollment Process:**

Following the initial assessment, the individual may participate in core programs offered under WIOA or choose to seek staff assistance to establish which programs best fit their needs and eligibility. Ultimately, the goal is to formulate a plan specific to the needs of each individual which can then lead to self-sustaining employment.

### **IV. Use of Technology-Enabled Intake:**

Each Local Plan shall include a description of how AJCs are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs mandated by the core program provision and carried out by AJCs<sup>2</sup>. As individuals are enrolled in multiple programs the use of a digital database is essential to efficiently track progress, especially when services are being provided concurrently. All AJCs are required to use Jobs4TN.gov for case management.

### **V. Examples of Beneficial Co-Enrollment:**

Eligible individuals, ages 18 to 24 at registration, may participate in both adult/dislocated worker and youth programs concurrently. Such individuals must meet the eligibility criteria applicable to the services received. For example, an individual may qualify to receive both youth services and adult career services but fail to meet the eligibility requirements for receipt of adult training services. Local areas may determine the appropriate level and balance of services under the youth, adult, dislocated worker programs, or through other services. The overall objective is to coordinate cohesive and consistent services which complement and strengthen the services offered by each individual program.

### **VI. Youth Program Co-Enrollment:**

Adult participants should be enrolled in a youth program if they are in need of specific services provided by a youth grant recipient, as outlined in the 14 basic elements listed below. When co-enrolled with the youth program, the youth program case manager will take the lead on the case. Once the youth program services are completed, if appropriate, the case will return to the Job Center case manager for additional adult focused services including follow-up services.

### **VII. Types of Benefits that Compliment WIOA Core Programs:**

#### **A. Supportive Services:**

Supportive Services offered by LWDA's are intended to work in concert with, and provide support to, WIOA core programs. These services are in addition to the core programs mandated under WIOA; supportive services are explained in the Combined State Plan and are intended to ensure better outcomes for participants. Services offered include – but are not limited to – transportation assistance and child care.

Co-enrollment with these additional services, also known as “intensive case management”, generally comes from providers within the LWDA. An example of a Federally-funded supportive service is the Supplemental Assistance for Needy Families (SNAP) Employment and Training program. Funds allocated through this program can be spent to cover the cost of transportation while an individual is attending training classes.

---

<sup>2</sup> WIOA Section 108(b)(21)

**B. Education and Training Services:**

The Drive to 55 initiative aims to have fifty-five percent (55%) of Tennesseans with a college degree or certificate by the year 2025. To accomplish this goal the State has created two programs to offer increased access to education, namely:

- Tennessee Promise: a program offered to all graduates of Tennessee high schools that provides a tuition free opportunity to attend two years at either a community college or technical college. The program also provides a mentor to assist a student as they progress through their education.
- Tennessee Reconnect: a grant that is offered to adults and provides an opportunity to earn a certificate from any of the twenty-seven (27) Tennessee Colleges of Applied Technology. Beginning July 1, 2017, Tennessee Reconnect will also be available in the 13 community colleges across the state.

By braiding funds between supportive and educational services a participant is receiving maximum benefit in proportion to the amount of funds spent. For example, an individual using Tennessee Reconnect grant funds to attend trade school classes may lack access to adequate transportation. Without access to transportation an individual would face a barrier to the skills training opportunity provided under WIOA. In this case SNAP Employment and Training funds could be used to provide a bus pass or gas card to eliminate this hindrance. By combining education and supportive services an individual is supported in the short-term while they work to achieve a long-term goal.

**VIII. Last Dollar Supportive Services:**

Funds within the Tennessee Reconnect and Tennessee Promise programs are considered to be “last dollars”, meaning that they are intended to fill the gap between the expenses covered under financial aid (e.g. tuition) and additional costs such as computers, books, and other supplies. If either the Tennessee Promise or Reconnect grants are used then WIOA funds would be used for supportive services. The process for co-enrollment, especially with programs consisting of “last dollars” that supplement WIOA programs, must be developed by the LWDB and explained within the Local Plan.

**IX. Automatic Co-Enrollment:**

WIOA programs that target similar demographics should necessitate automatic co-enrollment. One such example is Reemployment Services and Eligibility Assessments (RESEA), and dislocated worker programs. Other programs that may be paired could include Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T), TRADE, Temporary Assistance for Needy Families (TANF), Adult Education (AE), Dislocated Worker Programs and Youth Programs.

**X. Non-Duplication of Services:**

Each LWDB must have a strategy to coordinate education and workforce development activities carried out in the local area with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services<sup>3</sup>. This plan must ensure that concurrent enrollment in programs, which enhances the services provided to an individual, has avoided duplication or redundancies of services. Jobs4TN must be used by all partner programs to view the entirety of services offered to an individual, including dates and times when

---

<sup>3</sup> WIOA Section 108(b)(10)

services were received; consequently, ineffective program co-enrollment will be reduced through the use of this online portal.

#### **XI. Funding:**

In order to maximize services offered to an individual enrolled in multiple programs each LWDB may coordinate funding for individual training accounts with funding from other Federal, State, local, or private job training programs or sources to assist the individual in obtaining training services<sup>4</sup>. However, these programs must be identified and monitored to ensure that funds spent on each of the individuals' concurrent programs are allowed under their respective, specific provisions. For example, funds provided for youth programs must only be spent to carry out the guidelines described in WIOA Section 129(c)(2); similarly, funds spent on adult education and literacy programs must only be spent in accordance with the requirements explained in WIOA Section 232.

#### **XII. Adherence to Military Selective Services Act:**

One-Stop centers must ensure that each individual participating in any program or activity, or receiving any assistance or benefit, has not violated Section 3 of the Military Selective Service Act<sup>5</sup> by not presenting and submitting to registration as required<sup>6</sup>.

#### **XIII. Non-Discrimination:**

No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with, any such program or activity because of race, color, religion, sex, national origin, age, disability, or political affiliation or belief<sup>7</sup>.

Participation in programs and activities or receiving funds under this title shall be available to citizens and nationals of the United States, lawfully admitted permanent resident aliens, refugees, asylees, and parolees, and other immigrants authorized by the Attorney General to work in the United States<sup>8</sup>.

#### **References:**

20 CFR 679.560(b)(2)(ii); Tennessee Combined State Plan, WIOA Sections 3(12), 3(13)(A)-(D), 3(67); WIOA Section 108(b)(10), 108(b)(21); WIOA Section 129(c)(2); WIOA Section 134(c)(3)(F)(iv); WIOA Section 188(a)(2), 188(a)(5); WIOA Section 189(h); WIOA Section 232

---

<sup>4</sup> WIOA Section 134(c)(3)(F)(iv)

<sup>5</sup> 50 U.S.C. App. 453

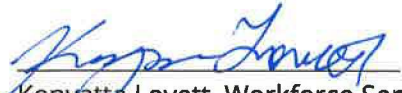
<sup>6</sup> WIOA Section 189(h)

<sup>7</sup> WIOA Section 188(a)(2)

<sup>8</sup> WIOA Section 188(a)(5)

**Contact:**

For any questions related to this policy, please contact the Program Integrity Unit at [Workforce.Board@tn.gov](mailto:Workforce.Board@tn.gov).

  
A handwritten signature in blue ink, appearing to read "Kenya Lovett", is written over a horizontal line.

Kenyatta Lovett, Workforce Services Assistant Commissioner

**Revised: February 4, 2020**